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July 14, 2023

Via ECF

The Honorable Katherine Polk Failla, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Guzman v. 26 Motors Corp. et al*
Case 1:23-cv-00283 (KPF)

Dear Judge Failla:

We are counsel to Plaintiff in the above-referenced case. We write with Defendants to jointly submit for the Court's endorsement a proposed Protective Order, which is attached here as **Exhibit A**. The parties used Judge Rakoff's Model Protective Order, which has been modified only to include this matter's caption and Your Honor's name.

We thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ C.K. Lee

C.K. Lee, Esq.